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MAY 22 1998

May 22, 1998

BY HAND DELIVERY

Magalie Salas, Esq.
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, D.C. 20554

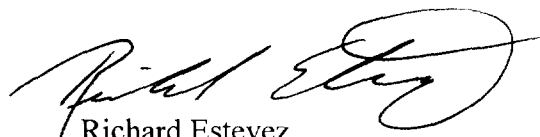
Re: Petition of Community Broadcasters Association
for Establishment of a "Class A" Television Service
Rulemaking No. 9260

Dear Ms. Salas:

Transmitted herewith, on behalf of Liberty University, Inc., are an original and four copies of comments to the above-referenced Petition for Rulemaking filed by Community Broadcasters Association.

Should there be any questions regarding this matter, please contact the undersigned counsel.

Sincerely,
FLETCHER, HEALD & HILDRETH, P.L.C.


Richard Estevez
Counsel for Liberty University, Inc.

Enclosures

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BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

In the Matter of

Petition of

Community Broadcasters Association

for Establishment of a "Class A"

Television Service

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2. W19BC provides its community with family-oriented programming geared to educate and entertain its viewers. Its diverse programming schedule includes inspirational shows, music and exercise programs, world news, in addition to numerous programs specifically designed to serve the informational and educational needs of children. Liberty caters its programming to serve and address the interests and concerns of its community. Liberty provides its viewers with programs from various networks such as FamilyNet, Gospel Music Television and America's Voice, which normally would not be available through other area stations. In addition, through its locally produced programming, Liberty is better able to concentrate on the specific local needs and problems of its community.

3. As demonstrated by the attached viewer comments, W19BC is greatly valued throughout its service area. W19BC is currently the only LPTV station in its area locally originating programming.

4. As evident from the recent Commission Order in MM Docket No. 87-268 adopting the DTV Table of Allotments, *Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order*, FCC 98-24 (released February 23, 1998) ("Order"), hundreds of LPTV stations will be displaced to allow for the smooth transition of full power television stations to digital television. W19BC is one of the LPTV stations to be displaced. In an effort to ensure continued service to its local community, Liberty is taking all possible steps to avoid having to cease operations. To that end, Liberty expects to spend well over \$150,000 during the next year in order to attempt to continue operations on another channel. Such an expenditure for a small station supported by a non-profit university is devastating to its continued operation.

However, Liberty is dedicated to continue broadcasting to its local community.

5. The CBA Petition has proposed rules that would allow certain LPTV stations providing substantial local programming service to qualify for "Class A" status. Obtaining such status, as proposed by CBA, would afford those LPTV stations primary user status, and thereby, provide protection from future displacement against all but full power television stations authorized as of the date of CBA's Petition.

6. Liberty strongly supports CBA's Petition for the creation of this new class and urges the Commission to commence promptly a rulemaking proceeding for the adoption of the proposed rules creating the new class of television station. As demonstrated above, Liberty has provided its community with seven years of quality local programming. W19BC's valued programming and existence is being threatened by the transition to DTV. While Liberty is dedicating almost all of its limited resources to mitigating the effects of its imminent displacement, it is unknown whether W19BC will survive. Should W19BC survive the displacement process, the establishment of the new Class A, as proposed, would ensure W19BC's continued existence and afford some protection from future displacement.

7. The assurance of continued operations and protection associated with the new Class A designation will enable Liberty and others in its position to know, as they plan for new facilities, the production of local programs and the conversion to digital operations, that the money being spent will not be wasted.

8. The Commission has expressed its commitment to affording LPTV stations continued existence and operation to the extent possible. The CBA Petition provides the Commission with a vehicle to afford some assurance that LPTVs will be able to continue

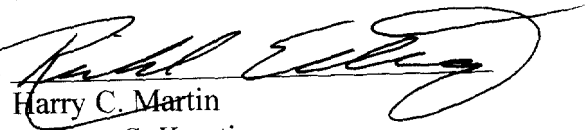
providing quality local programming and service to their local communities.

Accordingly, Liberty supports the CBA Petition and respectfully requests that the Commission commence a rulemaking proceeding to adopt the rules as proposed by the Petition.

Respectfully submitted,

LIBERTY UNIVERSITY, INC.

By:


Harry C. Martin
Andrew S. Kersting
Richard J. Estevez

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May 22, 1998

***VIEWERS' COMMENTS
ON LPTV STATION W19BC***

Class "A" Station Status--Ford Bill Comments

What would it mean to this community if Channel 19 were taken off the air due to the DTV development?

That's a good question, and perhaps the viewers of our station say it best in their letters and comments made to us over the past seven years.

Alex And Angie McFarland - Rustburg, VA

"I am just writing to say that my wife and I enjoy and appreciate your programming. We don't have or want cable television, so we are thankful to get channel 19 locally. We like John Ankerberg and also the concerts and musical shows. Please continue to provide good Christian television to central Virginia. We appreciate you."

Lawrence & Marcia Wingert - Huddleston, VA

"We have become more and more steady viewers, as the nightly fair on the other channels has become more and more unseemly to watch. Praise the Lord for you and the solid Christian viewing you provide. We have been enjoying God's News Behind the News, Dave Breese, Prophecy in the News, Origins, and Zola Levitt especially as well Jerry Falwell's Sunday Live and many other programs. Thank you for being there."

H. Roger Wilkes - Lynchburg, VA

"I really enjoy the all night Gospel Music! Also: Beverly Exercise, Charles Stanley, Jerry Falwell, and many others.! You have provided many blessings for me, keep up the good work, and may God richly bless you!"

Deborah M. Smith - Forest, VA

"I want you to know that I seldom watch any TV other than the shows that you present. I very much enjoy the wholesome and Godly based programs that you present. It is an oasis in an otherwise harsh land of telebroadcasting. Please keep up the good work!"

Mr. and Mrs. Ronald Sloan - Lynchburg, VA

"We enjoy the Christian Network so much. Now a days, it seems like there's nothing appropriate and wholesome to watch on other channels, and we are thankful for the uplifting programs you offer viewers."

Helen A Remaily - Lynchburg, VA

"Since the storm and your new equipment, we finally can receive your station on a regular basis! We enjoy the following programs: Beverly Exercise, Family Enrichment Series, In touch, and Worship. Thank you all for your diligence and the outstanding Christian programming you provide."

Donald R. Johnson - Bedford, VA

"I'm very thankful to have a Christian TV channel to watch and listen to. To be honest much (most) of the three main TV channels ABC, NBC, CBS programs aren't fit for a dog to watch. Thank you!"

Mr. and Mrs. W.O. Hall - Evington, VA

"We want to thank you for including America's Voice in your programming. We have been watching Morning View at 7:00am, Alan Keyes at 12:00pm, and Armstrong Williams at 7:00pm. We would like to know if you could possibly include America's Voice Tonight at 8:00pm? We rely on these programs to get honest and insightful views on the problems of our country. I also enjoy At Home With Arlene Williams. Thank you for doing a great job."

I don't know what else to add to these comments other than to say that in most cases we are the only source for these programs in this viewing area. We provide a service that is not being met by the other channels available in this market and programming that would definitely missed if it were removed.



The Viewers Choice

"W19BC is one of the few channels we watch. We receive your signal not by Cable, but by *Rabbit Ears* and the picture we receive is sharp and clear."

Lynchburg Viewer

"Channel 19 is refreshing to watch as opposed to all the junk T.V. on other channels. The station truly promotes families, the Lord Jesus, and the study of God's word."

Bedford Viewers

"I am glad you have Channel 19 and the real variety of programs you provide. I thought for a while Channel 21 would give us better programs, but 19 sure beats all others."

Lynchburg Viewer

"I receive your programs here and enjoy watching them." **Halifax Viewer**

"Now a days it seems like there is nothing appropriate and wholesome to watch on other channels. We are thankful for the uplifting programs you offer to viewers."

Lynchburg Viewer

"We enjoy several of your programs such as hunting and fishing shows on Saturday afternoon."

Bedford Viewers

"I have been viewing your fine Christian station since you started telecasting. I want you to know that I enjoy watching W19BC. I receive your signal on a UHF/VHF combination antenna and your picture is clearer than any of the other stations I receive, which includes some 15 stations."

Lynchburg Viewer

"Thank you for Channel 19...We enjoy the good programs, especially all the church services from Adrian Rogers, Ben Haden, John Rawlings, and of course our own Jerry Falwell."

Lynchburg Viewer

"I really enjoy all you have on, I try not to miss any of it." **Lynchburg Viewer**

"I recently moved to this area, and very much like what I see on your channel."

Lynchburg Viewer

"I love the *Cope* show and *Psychiatry and You*, they are very helpful."

Lynchburg Viewer